

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**CORE WIRELESS LICENSING
S.A.R.L.,**

Plaintiff,

v.

**LG ELECTRONICS, INC., and LG
ELECTRONICS MOBILECOMM U.S.A.,
INC.**

Defendants.

Case No. 2:14-cv-912-JRG-RSP

Jury Trial Demanded

AMENDED JOINT PROPOSED VERDICT FORM
(supersedes ECF No. 491)

[Note: Where the parties do not agree, Core's proposals are in **pink**, and LG's proposals are in **blue**.]

In answering these questions, you are to follow all of the instructions I have given you in the Court's Final Instructions to the Jury. Your answers to each question must be unanimous.

As used herein, "Core Wireless" means Core Wireless Licensing S.a.r.l. and "LG" means "LG Electronics, Inc." and "LG Electronics Mobilecomm U.S.A., Inc." As used herein, "'536 Patent" means U.S. Patent No. 6,633,536; and "'850 Patent" means U.S. Patent No. 7,804,850.

QUESTION 1:

Did Core Wireless prove by a preponderance of the evidence that LG infringes the following claims of the following patents?

Answer “Yes” or “No” for each Claim.

'536 Patent

Claim 19 _____

'850 Patent

Claim 21 _____

ANSWER THIS NEXT QUESTION ONLY AS TO THOSE CLAIMS YOU ANSWERED “YES” TO IN QUESTION 1 ABOVE—OTHERWISE DO NOT ANSWER THIS QUESTION.

QUESTION 2:

Did LG prove by clear and convincing evidence that any of the asserted claims of the following patents are invalid?

If you find the claims invalid, answer “Yes,” otherwise, answer “No.”

'536 Patent

Claim 19 _____

'850 Patent

Claim 21 _____

ANSWER THIS NEXT QUESTION ONLY AS TO THOSE CLAIMS YOU ANSWERED “YES” TO IN QUESTION 1 ABOVE—OTHERWISE DO NOT ANSWER THIS QUESTION.

QUESTION 3:¹

[Core Wireless Proposes: Did Core Wireless prove by a preponderance of the evidence that any of the asserted claims of the following patents are willfully infringed by LG?

If you find the claims were willfully infringed, answer “Yes,” otherwise, answer “No.”

'536 Patent

Claim 19 _____

'850 Patent

Claim 21 _____]

¹ LG maintains that any instruction or verdict form question on willful infringement is inappropriate on the facts of this case based on Core Wireless's allegation that LG is practicing standard technology, for the reasons set forth in LG's motion for summary judgment of no willful infringement, Dkt. 538, filed Aug. 12, 2016.

ANSWER QUESTION 4 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE CORE WIRELESS PATENTS TO BE INFRINGED AND NOT INVALID.

[LG Proposes: IF YOU DID NOT FIND ANY CLAIMS TO BE BOTH INFRINGED AND NOT INVALID, DO NOT ANSWER QUESTION 4.]

QUESTION 4:

For the claims you have found LG infringed, **[LG Proposes: if any,]**² what sum of money do you find by a preponderance of the evidence would reasonably compensate Core Wireless **[Core Wireless Proposes: for LG's past infringement]**³?

\$ _____

[LG Proposes: QUESTION 5:^{4 5}

Is the amount you found in Question 4 a lump sum or a running royalty?

Check one of the following:

Lump sum: _____

-OR-

² Core Wireless objects to the inclusion of “if any,” as redundant. The jury does not reach this question unless it has already determined that the claims are infringed and not invalid, making the “if any” confusing and unnecessary. At this stage in the verdict form, §284 would require that the jury award damages.

³ LG objects to Core Wireless’s addition of “for LG’s past infringement.” The jury is permitted to award damages in the form of a fully-paid up, lump sum award that covers all alleged infringement. *See Summit 6, LLC v. Samsung Elecs. Co. LTD.*, 802 F.3d 1283, 1300–01 (Fed. Cir. 2015) (affirming denial of ongoing royalty because lump-sum “jury award compensated [Plaintiff] for both past and future infringement through the life of the patent”).

⁴ CW objects to this question as irrelevant. The jury’s verdict will only cover LG’s past infringement and may not go beyond that point.

⁵ LG responds that the jury is permitted to award damages in the form of a fully-paid up, lump sum award that covers all alleged infringement. *See Summit 6, LLC v. Samsung Elecs. Co. LTD.*, 802 F.3d 1283, 1300–01 (Fed. Cir. 2015) (affirming denial of ongoing royalty because lump-sum “jury award compensated [Plaintiff] for both past and future infringement through the life of the patent”).

Running royalty: _____]

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The jury foreperson should then sign and date the verdict form in the spaces below and notify the marshal that you have reached a verdict. The jury foreperson should retain possession of the verdict form and bring it when the jury is brought back into the courtroom.

Signed this _____ day of September, 2016.

Jury Foreperson